

### **Category #53:**

The Guidelines should be amended to include additional information on Cleaning Product Category and Definitions Section for General purpose cleaners, floor finishes and floor strippers and carpet and vacuum cleaners.

### **State Response:**

The Guidelines were changed to reflect the removal of the phrase “wax floors” and replaced with “floor finish”. The Guidelines were also changed to recommend that schools minimize the use of carpeting in student occupied areas and reiterated the practicality of using walk off mats.

### **Frequently Asked Public Comment:**

#### Cleaning Product Categories and Definitions

##### --Cleaning Product Categories and Definitions

##### B. General Purpose Cleaners

Recommended Change: This category includes products used for routine cleaning of hard surfaces including impervious flooring such as concrete or tile. It does not include cleaners intended primarily for the removal of rust, mineral deposits, or odors. It does not include products intended primarily to strip, polish, or ~~wax floors~~ apply floor finisher, and it does not include cleaners intended primarily for cleaning toilet bowls, dishes, laundry, glass, carpets, upholstery, wood, or polished surfaces. This category does not include any products required to be registered under Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), such as those making claims as sterilizers, disinfectants, or sanitizers

Justification: “Wax floors” is outdated terminology. It connotes petro to synthetic chemicals.

##### C. Carpet Cleaners

This category includes products used for routine cleaning of carpets and rugs. This category may include, but is not limited to, products used in cleaning by means of extraction, shampooing, dry foam, bonnet or absorbent compound. It does not include products intended primarily for spot removal. This category does not include any products required to be registered under FIFRA, such as those making claims as sterilizers, disinfectants, or sanitizers.

- ♣ ADD: Districts are encouraged to minimize the use of carpets in student occupied areas. This will eliminate many fibrous materials and the micro-organisms contained in them.
- ♣ ADD: The use of walk off mats will help with limiting dirt, dust and grime carried into the school and onto carpets
- ♣ Carpets can absorb pesticides that are tracked into a building, dust from any source, such as floor burnishing, pet dander, cleaning products used to clean the carpet, moisture/water, and mold and mildew.
- ♣ The cleaner the carpet, the more sanitary the results. Carpet cleaning detergents must penetrate through the soil and around the fibers to prepare the soil for easy release.
- ♣ The goal is to REMOVE ALL SOIL from a carpet because left behind soil in a carpet makes effective vacuuming difficult, speeds the collection of new soil, holds moisture, slows carpet drying and accelerates the increase of germs and mold.

Justification: Minimizing the use of carpets will directly contribute to the indoor air quality of the school. Walk off mats are proven to aid in minimizing dirt, dust and grime.

##### D. Vacuum Cleaners

Recommended Change: High performance vacuum cleaners such as HEPA vacs have a significant impact on improved indoor air quality (IAQ). At the same time, vacuums that effectively remove and contain soil while keeping the carpet looking good will help carpets last longer. So, ultimately, better performing vacuums provide a greater return on your investment and ensure a healthier indoor environment.

Justification: HEPA Vac filtration systems remove particles and serve as a useful tool in improving indoor air quality.

#### G. Paper Products: Paper Towels and Toilet Tissues

Recommended Change: *Refer to Green Seal, Inc. product criteria for paper products – GS-09.*

Justification: Using GS-09 paper product criteria is consistent with the Green Seal, Inc. standards OGS sets forth under Section V of the proposed guidelines.

#### H. Floor Finishes and Floor Strippers

This category also includes floor strippers:

- ♣ Floor Strippers: There are two types of strippers based on the floor dressings being removed or stripped.

1. Waxes or natural products – Some can remove polymers, but the stripping job will take much longer than do liquefiers developed for polymers.

Recommended Change: 2. Polymers or synthetic products – Liquefiers were developed to break up and lift polymers and work just as quickly for removing ~~waxes~~ finisher and natural products. (These floor strippers may be used on many floor surfaces, such as terrazzo, marble, resilient dimensional tile and sheet floor coverings, finished synthetic wood flooring, poured liquid flooring, stone, etc.

Justification: “Waxes” is outdated terminology.

(Signed By: David Brooks (Malone CSD), President & Frederick Koelbel (West Islip UFSD), 1<sup>st</sup> Vice President, Legislative Committee Chairman)(Submitted By: Kathleen Van De Loo, Executive Director, (NYS SBGA) NYS Association for Superintendents of School Buildings and Grounds, Inc., Albany, NY)

--Section VI (C) Carpet Cleaners. Green Cleaning is a great concept; but real world-cleaning effectiveness, the removal of soil, oily products and VOCs from an indoor environment, are the key to improving indoor environmental quality. The Carpet and Rug Institute in Dalton, Georgia has a cleaning product testing program in effect right now that tests the “cleaning credibility” of various cleaning products for carpet. Based on cleaning efficacy, and re-soiling characteristics, this program works directly at having cleaner carpet, and a cleaner environment, inside and out.

The reference to germicide may be better compared to Antimicrobial or Biocide. For the most part antimicrobial capabilities are built into a product or cleaner, to help reduce, eliminate, or inhibit microbial growth. Biocides are products that actually kill microorganisms, and may pose harm to humans, or living organisms.

(Carey Vermeulen, President, Institute of Inspection, Cleaning, and Restoration Certification, (IICRC) Institute Of Inspection, Cleaning And Restoration Certification, Vancouver, WA)

#### --Section VI. Cleaning Product Categories and Definitions (pages 14-17)

##### Hand Soaps

##### Section F. & Appendix 4 (GS-41)

GS-41: P&G understands that the Green Seal approval process for this standard has not been completed. Therefore, it is inappropriate to cite it in the context of these guidelines. Moreover, the standard itself is unclear on certain points.

At (h), the standard states that the product "...not be formulated with antibacterial ingredients nor make antibacterial, disinfecting, antiseptic or sanitizing product claims... or the need to be registered under the United States Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). This criterion creates wholesale confusion and only emphasizes the need to put it aside.

Product Preservatives: The requirement that no "antibacterial ingredients" be found in the soap poses a potential problem. Given their organic nature, hand soaps cannot maintain shelf life without the use of preservatives to prevent bacteria and/or fungal growth. The function of these preservatives is biostatic. And there is a wide range of biostatics approved by EPA and PMRA that perform this function. It is essential that these not be prohibited.

FIFRA Registration: Antibacterial soaps are regulated by the Food and Drug Administration (FDA), not the EPA which administers FIFRA. Coverage by FIFRA would require the products to be registered as "pesticides." Consequently, the citation to FIFRA in the GS-41 draft standard is confusing.

Antibacterial Soaps – Efficacy: There is overwhelming evidence that use of antimicrobial-containing hand cleaners does reduce the biological load of illness-causing bacteria on hands. Given that the FDA has not made any change to the way in which it regulates antimicrobial hand soaps, it is recommended that New York State follow the FDA lead and not take the premature step of setting additional and arbitrary restrictions on institutional hand cleaners.

(Martha R. Macy-Ruhe, Product Safety & Regulatory Affairs, P&G Household Care, The Proctor & Gamble Company, Cincinnati, OH)